

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JOSIAH JOHNSON AND JENNIFER
JOHNSON,

Plaintiffs,

v.

JEREMIAH JOHNSON, THE ALTAR
GLOBAL INC., PAUL JOHNSON, AND
PAUL T. JOHNSON MINISTRIES,

Defendants.

Civil File No. 1:25-cv-00658-TWP-MG

JURY TRIAL REQUESTED

PLAINTIFFS' PRELIMINARY WITNESS & EXHIBIT LISTS

Plaintiffs Josiah Johnson and Jennifer Johnson ("Plaintiffs"), by counsel, hereby submit the following Preliminary Witness and Exhibit Lists. These preliminary lists are based on the information reasonably available to Plaintiffs at this stage of the litigation. Plaintiffs have not completed their investigation or discovery and reserve the right to amend, supplement, or change the lists as appropriate pursuant to the Federal Rules of Civil Procedure, Local Rules of the United States District Court for the Southern District of Indiana, and any other applicable rules or orders of this Court.

Capitalized terms not otherwise defined shall have the meanings ascribed to them in Plaintiffs' Complaint.

Preliminary Witness List

1. Josiah Johnson

c/o Warren V. Norred
Norred Law, PLLC
515 E. Border Street
Arlington, TX 76010
2. Jennifer Johnson

c/o Warren V. Norred
Norred Law, PLLC
515 E. Border Street
Arlington, TX 76010
3. Jeremiah Johnson

c/o Dustin T. Gaines and Kathryn Wilburn Drey
Gaines, Goodspeed, & Juba, P.C.
2201 Spinks Road, Suite 208
Flower Mound, Texas 75022
4. One or more representatives of The Altar Global Inc.

c/o Dustin T. Gaines and Kathryn Wilburn Drey
Gaines, Goodspeed, & Juba, P.C.
2201 Spinks Road, Suite 208
Flower Mound, Texas 75022
5. Paul Johnson

c/o Dustin T. Gaines and Kathryn Wilburn Drey
Gaines, Goodspeed, & Juba, P.C.
2201 Spinks Road, Suite 208
Flower Mound, Texas 75022
6. One or more representatives of Paul T. Johnson Ministries

c/o Dustin T. Gaines and Kathryn Wilburn Drey
Gaines, Goodspeed, & Juba, P.C.
2201 Spinks Road, Suite 208
Flower Mound, Texas 75022
7. Any third party identified in the First Amended Complaint.

8. Any third party identified in the exhibits to the First Amended Complaint.
9. Any third party who provided information for or participated in the Defamatory Article.
10. Any third party listed or referred to in the Defamatory Article.
11. Any witness identified by any party to this litigation.
12. Any individual or entity identified or referred to as having relevant knowledge by any party to this litigation in their discovery responses.
13. Any individual or entity identified or referred to as having relevant knowledge in any document produced or to be produced by any party to this litigation.
14. Any individual identified or referred to in any deposition in this litigation as having personal knowledge of any matter related to this litigation.
15. Any expert witnesses retained by any party who have produced information, reports, or opinions related to this litigation.
16. Any person necessary to lay the foundation for the admissibility of a document, summary exhibit or other evidence including, but not limited to, any records custodian for any party or non-party.
17. Any person who provides Rule 30(b)(6) testimony on behalf of a company, corporation, or other entity, whether or not such company, corporation, or entity is a party.
18. Any person who executes interrogatory responses or verification for any papers or pleadings related to this case.
19. Any person necessary for impeachment or rebuttal.
20. Any witness identified by any party to this litigation in any witness list.

21. Any and all individuals identified or described in the documents produced, or to be produced, in response to discovery served in this matter.

Plaintiffs reserve the right to amend, supplement, or change this Witness List as additional witnesses become known.

Preliminary Exhibit List

1. The Defamatory Article.
2. Any exhibit to the First Amended Complaint.
3. Any document or media article referenced in the First Amended Complaint.
4. Any social media post relating to the events described in the First Amended Complaint.
5. Written communications between the parties and non-parties to this lawsuit, including, but not limited to, text messages, social media messaging, and/or letter correspondence.
6. All documents and communications concerning any facts or issues raised in the pleadings of this litigation.
7. All pleadings and court filings related to this litigation.
8. All documents concerning any expert report produced in this litigation.
9. Deposition transcripts of all depositions taken in this lawsuit.
10. Timelines and chronological summaries of relevant events.
11. Summaries of evidence, testimony, and documents.
12. Demonstrative exhibits prepared by experts to illustrate their testimony.
13. All exhibits introduced in depositions taken during this lawsuit.
14. All discovery responses and sworn statements provided by any party or witness.
15. Any exhibit used for rebuttal or impeachment purposes.
16. All documents disclosed by any party in this litigation.

17. All insurance policies which do, or have, directly or indirectly, provide(d) coverage for the acts and/or omissions at issue in this litigation.

Plaintiffs reserve the right to amend, supplement or change this Exhibit List as additional exhibits become known.

Dated: June 13, 2025

Respectfully submitted,

/s/ Brent W. Huber

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/s/ Warren V. Norred

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Attorneys for Plaintiffs, Josiah Johnson and Jennifer Johnson

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a copy of the foregoing has been served on all counsel of record for electronic service this 13th day of June 2025 by the Court's electronic filing system.

/s/ Brent W. Huber

Brent W. Huber